



# Legal Aid Society

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December 19, 2007

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Ms. Elizabeth O'Donnell, Executive Director  
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**Carolyn A. Dean**  
Controller

**Patricia A. Kennedy**  
Director of Human  
Resources and  
Administration

RE: In the Matter of:  
AN INVESTIGATION OF THE ENERGY AND REGULATORY ISSUES IN SECTION  
50 OF KENTUCKY'S 2007 ENERGY ACT, CASE NO. 2007-00477

**Ronald Marstin**  
Managing Attorney  
Urban Division

Dear Ms. O'Donnell:

**S. Stewart Pope**  
Advocacy Director

Enclosed for filing in the above-captioned case are:

**Robert Frederick Smith**  
Managing Attorney  
Rural Division

1. an original and ten (10) copies of a Motion for Full Intervention in the above styled case on behalf of People Organized and Working for Energy Reform ("POWER"); and
2. an original and ten (10) copies of a Motion for Full Intervention in the above styled case on behalf of the Association of Community Ministries ("ACM").

**Attorneys**  
 Andre Bergeron  
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 Gwendolyn Horton  
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 Barbara A. Sullivan  
 Amy Karn Turner  
 Rita J. Ward  
 Stephanie C. Willis  
 John Young

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy of each Motion and return it to me in the enclosed self addressed stamped envelope.

**Paralegals**  
 Emily Brite  
 Roy Denny  
 Carol Dupin  
 Catherine M. Ford  
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 Rachel Popham  
 Andrea Y. Robbins  
 MaryAnn Werling  
 Alberta H. White

Thank you for your assistance in this matter. Please contact me if you need further information.

Sincerely,

Lisa Kilkelly  
Attorney for POWER and ACM

**Wyatt, Tarrant & Combs Fellow:**  
Shawna Scheidel

**IOITA Fellows:**  
Nellie McCall  
Betsy Janes

Cc: parties of record



**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**RECEIVED**  
DEC 21 2007  
PUBLIC SERVICE  
COMMISSION

**In The Matter Of:**

<b>AN INVESTIGATION OF THE</b>	)	
<b>ENERGY AND REGULATORY</b>	)	<b>ADMINISTRATIVE</b>
<b>ISSUES IN SECTION 50 OF</b>	)	<b>CASE NO. 2007-00477</b>
<b>KENTUCKY'S 2007 ENERGY ACT</b>	)	

**MOTION FOR FULL INTERVENTION**  
**BY ASSOCIATION OF COMMUNITY MINISTRIES**

Comes now, **ASSOCIATION OF COMMUNITY MINISTRIES** ("ACM"), by counsel, and files this Motion for Full Intervention in the above-styled proceeding.

ACM is a Kentucky 501(c)(3) nonprofit corporation and its membership is comprised of 15 independent community ministries that provide services to the Louisville Metro area. The common mission for all 15 members is to provide an emergency assistance network in partnership with the Louisville Metro Government, local congregations, and other businesses and organizations. Each Ministry serves a specific geographical area to ensure that all of Louisville Metro is covered under the umbrella of the ACM. Among the social services provided by ACM members are utility assistance programs. ACM members assist low-income households whose utility service is disconnected by Louisville Gas & Electric Co. ("LG&E") because of their inability to pay utility bills by providing both financial assistance and advocacy. ACM members also implement the Winterhelp program. ACM's address is P.O. Box 99545, Louisville, Kentucky 40269.

ACM has an interest in how the issues identified by the General Assembly for consideration in this proceeding may affect low-income utility customers. Issues relating

to demand management strategies have the potential to affect low-income households, through cost allocation issues, the availability of specific programs for low-income customers, such as low-income weatherization programs and the accessibility of demand management programs in general to low-income customers. Issues relating to rate structures and cost recovery are of interest to ACM since affordable utility service is a critical issue for low-income communities.

ACM is in the process of taking over the advocacy activities previously conducted by Metro Human Needs Alliance (“MHNA”), a frequent intervenor on behalf of low-income utility customers in Commission proceedings<sup>1</sup>. Due to recent staffing and funding limitations, MHNA has had to significantly scale back its activities. ACM has replaced MHNA as a Joint Applicant in the recently approved Home Energy Assistance Program in the Louisville Gas and Electric service territory<sup>2</sup>.

ACM represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, the Association of Community Ministries requests that it be granted full intervention as a party to this proceeding.

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<sup>1</sup> Some recent cases in which MHNA has intervened include: *Consideration of the Requirements of the Federal Energy Policy Act of 2005 Regarding Time-Based Metering, Demand Response and Interconnection Service*, Case No. 2006-00045; *An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company*, Case No. 2003-00433; *An Examination of Louisville Gas and Electric Company’s Prepaid Gas and Electric Service*, Case No 2002-00232; *Demand Side Management 2000-2007 Program Plan of Louisville Gas & Electric Company and Kentucky Utilities Company*, Case No. 2000-459; and *An Adjustment of Gas Rates of Louisville Gas & Electric Company*, 2000-080.

Respectfully submitted,

  
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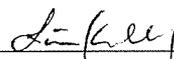
Attorney for ACM

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<sup>2</sup> *Joint Application of Louisville Gas & Electric Co., Association of Community Ministries, Inc., People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program, Case No 2007-00337.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention by Association of Community Ministries was served on the following parties on the 19<sup>th</sup> day of December, 2007 by United States mail, postage prepaid.

  
\_\_\_\_\_  
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